

### **Virginia Title V Operating Permit**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Waverly Particleboard Company, LLC

Facility Name: Waverly Particleboard Plant

Facility Location: 721 West Main Street  
Waverly, Virginia

Registration Number: 50169

Permit Number: PRO-50169

Effective Date: January 1, 2003

Amended Date: April 26, 2005

Expiration Date: January 1, 2008

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Robert G. Burnley  
Director, Department of Environmental Quality

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Signature Date

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## **I. Facility Information**

### **Permittee**

Waverly Particleboard Company, LLC  
Waverly Particleboard Plant  
P.O. Box 378  
721 West Main Street  
Waverly, Virginia 23890

### **Responsible Official**

Mr. Glenn R. Gray  
General Manager

### **Facility**

Waverly Particleboard Plant  
721 West Main Street  
Waverly, Virginia 23890

### **Contact Person**

Mr. Glenn R. Gray  
General Manager  
(804) 834-2201

**County Plant Identification Number:** 51-183-0001

**Facility Description:** NAICS Code: 2493, Particleboard Manufacturing Facility

This facility manufactures particleboard from wood shavings, sawdust, recycled oriented strand board, and chips (collectively referred to as shavings), urea-formaldehyde resin, wax emulsion, and urea scavenger. Primary operations at the facility include receiving and storage of wood shavings, drying and refining of wood shavings, board mat forming, board pressing, use of rough and finish trim saws, and sanding. Fuels used in the facility's boilers and dryers consist of wood dust, natural gas, and distillate oil.

## II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Emission Unit Description (Construction Date)	Maximum Rated Capacity	Pollution Control Device (PCD)	PCD-ID	Pollutant Controlled	Exhaust ID	Applicable Permit Date
<b>Wood Products Receiving and Storage, Maximum rated capacity of 125 tons/hr</b>							
EP -D1	Front end loading from storage					EP -D1	7/17/2002
EP -D2	Truck dump					EP -D2	7/17/2002
EP -D3	#1 incline conveyor transfer point					EP -D3	7/17/2002
EP -D4	#1 storage conveyor transfer point					EP -D4	7/17/2002
EP -D5	Old truck dump					EP -D5	7/17/2002
EP -D6	Storage house feed					EP -D6	7/17/2002
EP -D7	Trim waste conveyor to storage house					EP -D7	7/17/2002
EP -D8	#2 storage conveyor drop to #3 storage conveyor					EP -D8	7/17/2002
EP -D9	#2 storage conveyor drop to chip pile					EP -D9	7/17/2002
EP -D10	#3 storage conveyor					EP -D10	7/17/2002
EP -D11	Tipple conveyor to pile					EP -D11	7/17/2002
EP -D12	Tipple conveyor to #4 storage conveyor					EP -D12	7/17/2002
EP -D13	#4 Storage conveyor end					EP -D13	7/17/2002
EP -D14	#3 bin conveyor end					EP -D14	7/17/2002
EP -D15	Chute to scalper					EP -D15	7/17/2002
EP -D16	#4 Conveyor bin end					EP -D16	7/17/2002
EP -D18	#5 bin conveyor end					EP -D18	7/17/2002

Emission Unit ID	Emission Unit Description (Construction Date)	Maximum Rated Capacity	Pollution Control Device (PCD)	PCD-ID	Pollutant Controlled	Exhaust ID	Applicable Permit Date
EP -D22	Reclaim from storage; front end loader pickup					EP -D22	7/17/2002
EP -D23	Truck loading, front end loader					EP -D23	7/17/2002
EP -D24	Truck loading drop to truck					EP -D24	7/17/2002
Boilers							
B-3	Ames boiler (1961)	5.03 mmbtu/hr				EP -B-3	7/17/2002
B-2	Cleaver Brooks Boiler (1980)	10.46 mmbtu/hr				EP -B-2	7/17/2002
B-1	Keeler Boiler(1977)	26.54 mmbtu/hr sanderdust	Joy multicyclone centrifugal collector 9VM10, 18-3 with a control efficiency of 78% for PT	C01	PT	EP -B-1	7/17/2002
		23 mmbtu/hr #2 oil					
Face System							
FS-1A	Face System Pre Dryer and supplemental heater (1978)	7 tons/hr wood furnish	General Sheet Metal Cyclone, 10 feet diameter	C02	PT	EP -FS-1	7/17/2002
		25 mmbtu/hr natural gas					
		25 mmbtu/hr #2					
FS-1B	McConnell Sanderdust Burner for Face Pre Dryer (1980)	28 mmbtu/hr sanderdust					
FS-2	Face System Final Dryer Guaranteed Performance (1973)	18.5 tons/hr wood furnish	Bruning and Federle cyclone, 14 feet diameter	C03	PT	EP -FS-2	7/17/2002
		25 mmbtu/hr natural gas					
		25 mmbtu/hr #2					
EP -D17	Drop into Face Sawdust Bin (1978)	7000 cubic feet				EP -D17	7/17/2002
EP -D28	Drop from sawdust screen overs					EP -D28	7/17/2002
EP -D19	Drop into Miller Hoff bin (face furnish)	7360 cubic feet				EP -D19	7/17/2002
FS-3A	Hog (1997)	12.6 tons wood/hr	Face Screen Baghouse Western pneumatics, Inc, 80 Cartridge Model. with a design control efficiency of 99.9% and a maximum system air movement capacity of 14000 ACFM.	C04	PT	EP -FS-3	7/17/2002
FS-3B	Accepts Aspirator (1997)	4.6 tons wood/hr					
FS-3C	Fines Aspirator (1997)	3.2 tons wood/hr					
5	Face Final dryer Infeed Conveyor (1997)	18.5 tons/hr	Enclosure				7/17/2002

Emission Unit ID	Emission Unit Description (Construction Date)	Maximum Rated Capacity	Pollution Control Device (PCD)	PCD-ID	Pollutant Controlled	Exhaust ID	Applicable Permit Date
5A	Shavings Transfer Conveyor (1997)	23.0 tons/hr	Enclosure				7/17/2002
5B	Hog Discharge Transfer Conveyor (1997)	20.0 tons/hr	Enclosure				7/17/2002
5C	Hog Feed Conveyor (1997)	21.0 tons/hr	Enclosure				7/17/2002
5D	Hog Discharge Conveyor (1997)	20.0 tons/hr	Enclosure				7/17/2002
8	Overs Conveyor #2 (1997)	22.0 tons/hr	Enclosure				7/17/2002
8A	Overs Conveyor #1 (1997)	22.0 tons/hr	Enclosure				7/17/2002
36	Final Face Dryer Cyclone Discharge Conveyor (1997)	25.5 tons/hr	Enclosure				7/17/2002
37	Primary Screen Feed Conveyor (1997)	25.5 tons/hr	Enclosure				7/17/2002
38	Accepts Conveyor (1997)	4.6 tons/hr	Enclosure				7/17/2002
39	Fines Conveyor (1997)	3.2 tons/hr	Enclosure				7/17/2002
EP-D25	Rock Drop from Aspirators					EP-D25	7/17/2002
FS-4	Trim Recovery Bin (1973)	4608 cubic feet	Aerodyne Model 1600 SV 560 CR cyclone	C05	PT	EP-FS-4	7/17/2002
FS-5A FS-5B FS-5C	Pallman Face Refiners 1, 2, and 3 (1973)	20 tons/hr	Baghouse Clarke Model 1-60-20 with a maximum system air movement capacity of 41908 ACFM.	C06	PT	EP-FS-5	7/17/2002
<b>Core System</b>							
EP-D21	Drop into Wet Shaving Silo (1966)	3696 cubic feet				EP-D21	7/17/2002
EP-D20	Drop into Dry Shaving Silo (1956)	28681 cubic feet				EP-D20	7/17/2002
CS-4A CS-4B CS-4C	Shaker Screens 1-5 (1965/1975)	19 tons of wood furnish/hr	Pneumafil RAF 11.5-320 baghouse with a maximum system air movement capacity of 44608 ACFM	C09	PT	EP-CS-4	7/17/2002
CS-5A CS-5B			Pneumafil RAF 11.5/320 Baghouse with a maximum system air movement capacity of 39384 ACFM.	C10	PT	EP-CS-5	7/17/2002

Emission Unit ID	Emission Unit Description (Construction Date)	Maximum Rated Capacity	Pollution Control Device (PCD)	PCD-ID	Pollutant Controlled	Exhaust ID	Applicable Permit Date
CS-6A CS-6B CS-6C CS-6D	Bauer Refiners 1-4 (1965-1967)	19 tons of wood furnish/hr	Clarke Model 1-40-20 fabric filter baghouse with a maximum system air movement capacity of 24344 ACFM.	C11	PT	EP-CS-6	7/17/2002
CS-7A CS-7B	Bauer Refiners 5-6 (1964)		Clarke Model 1-40-20 fabric filter baghouse with a maximum system air movement capacity of 24344 ACFM.	C12	PT	EP-CS-7	7/17/2002
CS-1	Core System Pre Dryer and supplemental heater (1956)	14 tons/hr wood furnish	General Sheet Metal cyclone 14 feet diameter	C07	PT	EP-CS-1	7/17/2002
		25 mmbtu/hr natural gas					
		25 mmbtu/hr #2					
CS-2	Core System Final Dryer and supplemental heater (1964)	19 tons/hr wood furnish	High Efficiency Cyclone Fisher-Klosterman, Inc, Size XQ120-50 11 feet diameter	C08	PT	EP-CS-2	7/17/2002
		25 mmbtu/hr natural gas					
		25 mmbtu/hr #2					
CS-3	Energex Wood Dust Burner (1975)	27.55 mmbtu/hr sanderdust				EP-CS-3	7/17/2002
<b>Press Area</b>							
PF-1	Production line reclaim from former tray cleanup, cutoff saw, conveyor dust pickups, prepress, prepress pickups, and prepress side trim saws (1964)	1.3 tons/hr	Clarke Model 1-60-20 fabric filter baghouse with a maximum system air movement capacity of 41408 ACFM.	C13	PT	EP-PF-1	7/17/2002
EP-D29	Overflow drop point from reject bin					EP-D29	7/17/2002
PF-2	Washington Iron Works Main Press (1964)	17000 converted feet/hr, ¾ inch basis				EP-PF-2A	7/17/2002
						EP-PF-2B	7/17/2002
EP-D30	Cleanup Conveyor Dump from Main Press					EP-D30	7/17/2002
PF-3A	Pressline Trim Saws (1965)	1.1 tons trim/hr	Clarke Model 1-40-20 fabric filter baghouse and a maximum system air movement capacity of 27306 ACFM.	C14	PT	EP-PF-3	7/17/2002
PF-3B	Jenkins T&E Saw (1964)	1.1 tons trim/hr					
PF-4	Board Cooler (1964)	17000 converted feet/hr, ¾ inch basis				EP-PF-4	7/17/2002

Emission Unit ID	Emission Unit Description (Construction Date)	Maximum Rated Capacity	Pollution Control Device (PCD)	PCD-ID	Pollutant Controlled	Exhaust ID	Applicable Permit Date
PF-5	Kimwood 6-head sander (1971)	6.2 tons of sanderdust/hr	Clarke Model 1-60-20 fabric filter baghouse with a design control efficiency of 99.9% and a maximum system air movement capacity of 37981 ACFM	C15	PT	EP-PF-5A	7/17/2002
			Clarke Model 1-60-20 fabric filter baghouse with a design control efficiency of 99.9% and a maximum system air movement capacity of 38972 ACFM.	C16	PT	EP-PF-5B	7/17/2002
PF-6	Dryer Sanderdust collection system and bin(1975)	3.5 tons/hr	Clarke Model 1-15-20 fabric filter baghouse with a maximum system air movement capacity of 11160 ACFM.	C17	PT	EP-PF-6	7/17/2002
EP-D26	Overs pile from sanderdust screen					EP-D26	7/17/2002
EP-D27	Overflow drop from sanderdust bin					EP-D27	7/17/2002
PF-7A	IMC Saw (1969)	0.72 tons trim/hr	Clarke Model 1-40-20 fabric filter baghouse with a maximum system air movement capacity of 24344 ACFM.	C18	PT	EP-PF-7	7/17/2002
PF-7B	Board Breaker (1996)	0.05 tons/hr					



### III. Facility Requirements

#### A. Limitations

1. **Emission Controls** - Particulate emissions from the Keeler boiler (B-1) shall be controlled by a Joy multicyclone centrifugal collector Model Number 9 VM 10 18-3 (C01) with a minimum control efficiency of 78%. The multicyclone shall be provided with adequate access for inspection and shall be in operation when the Keeler boiler (B-1) is operating.  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 3 of 7/17/02 Permit)
2. **Emission Controls** - Particulate emissions from the McConnell burner (FS-1B) and the face pre-dryer (FS-1A) shall be controlled by a General Sheet Metal cyclone (C02). The cyclone shall be provided with adequate access for inspection and shall be in operation when the McConnell burner (FS-1B) or the face pre-dryer (FS-1A) is operating.  
(9 VAC 5-80-850, Condition 4 of 7/17/02 Permit)
3. **Emission Controls** - Particulate emissions from the face final dryer (FS-2) shall be controlled by a Bruning and Federle cyclone (C03). The cyclone shall be provided with adequate access for inspection and shall be in operation when the face final dryer (FS-2) is operating.  
(9 VAC 5-80-850, Condition 5 of 7/17/02 Permit)
4. **Emission Controls** - Particulate emissions from the exhausts of the accepts aspirator (FS-3B) and the fines aspirator (FS-3C) shall be controlled by a baghouse (C04) with a maximum exhaust grain loading of 0.01 gr/dscft and a maximum system air movement capacity of 14000 ACFM. The baghouse (C04) shall be provided with adequate access for inspection and shall be in operation when each process is operating.  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 6 of 7/17/02 Permit)
5. **Emission Controls** – Fugitive particulate emissions from the collection and transferring of collected wood shaving and sawdust from the accepts aspirator (FS-3B) and the fines aspirator (FS-3C) shall be controlled by:
  - a. Rotary air lock from the collector to an enclosed bin;
  - b. Covering of the conveyors identified as follows: EU-ID's 5, 5A, 5B, 5C, 5D, 8, 8A, 36, 37, 38, and 39; and
  - c. Complete enclosure.  
(9 VAC 5-80-850, VAC 5-50-260, Condition 7 of 7/17/02 Permit)

6. **Emission Controls** – Particulate emissions from the trim recovery bin (FS-4) shall be controlled by an Aerodyne Model 1600 SV 560 CR cyclone (C05). The cyclone (C05) shall be provided with adequate access for inspection and shall be in operation when the face system is receiving material from the trim recovery bin (FS-4).  
(9 VAC 5-80-850, Condition 8 of 7/17/02 Permit)
7. **Emission Controls** – Particulate emissions from the Pallman face refiners 1, 2, and 3 (FS-5A, FS-5B, and FS-5C) shall be controlled by a Clarke Model 1-60-20 fabric filter baghouse (C06) with a maximum exhaust grain loading of 0.003 gr/dscft and with a maximum system air movement capacity of 41908 ACFM. The baghouse (C06) shall be provided with adequate access for inspection and shall be in operation when the Pallman face refiners (FS-5A, FS-5B, and FS-5C) are in operation.  
(9 VAC 5-80-850, Condition 9 of 7/17/02 Permit)
8. **Emission Controls** - Particulate emissions from the shaker screens 1 through 3 (CS-4A, CS-4B, and CS-4C) shall be controlled by a Pneumafil RAF fabric filter baghouse (C09) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 44608 ACFM. The baghouse (C09) shall be provided with adequate access for inspection and shall be in operation when the shaker screens 1 through 3 (CS-4A, CS-4B, and CS-4C) are operating.  
(9 VAC 5-80-850, Condition 10 of 7/17/02 Permit)
9. **Emission Controls** - Particulate emissions from the shaker screens 4 and 5 (CS-5A and CS-5B) shall be controlled by a Pneumafil RAF fabric filter baghouse (C10) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 39384 ACFM. The baghouse (C10) shall be provided with adequate access for inspection and shall be in operation when the shaker screens 4 and 5 (CS-5A and CS-5B) are operating.  
(9 VAC 5-80-850, Condition 11 of 7/17/02 Permit)
10. **Emission Controls** - Particulate emissions from the Bauer refiners 1 through 4 (CS-6A, CS-6B, CS-6C, and CS-6D) shall be controlled by a Clarke Model 1-40-20 fabric filter baghouse (C11) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 24344 ACFM. The baghouse (C11) shall be provided with adequate access for inspection and shall be in operation when the Bauer refiners 1 through 4 (CS-6A, CS-6B, CS-6C, and CS-6D) are operating.  
(9 VAC 5-80-850, Condition 12 of 7/17/02 Permit)
11. **Emission Controls** - Particulate emissions from the Bauer refiners 5 and 6 (CS-7A and CS-7B) shall be controlled by a Clarke Model 1-40-20 fabric filter baghouse (C12) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 24344 ACFM. The baghouse (C12) shall be provided with adequate access for inspection and shall be in operation when the Bauer refiners 5 and 6 (CS-7A and CS-7B) are operating.  
(9 VAC 5-80-850, Condition 13 of 7/17/02 Permit)

12. **Emission Controls** – Particulate emissions from the core pre-dryer (CS-1) shall be controlled by a General Sheet Metal cyclone (C07). The cyclone (C07) shall be provided with adequate access for inspection and shall be in operation when the core pre-dryer (CS-1) is operating.  
(9 VAC 5-80-850, Condition 14 of 7/17/02 Permit)
13. **Emission Controls** – Particulate emissions from the core final dryer (CS-2) shall be controlled by Fisher-Klosterman High Efficiency cyclone (C08). The cyclone (C08) shall be provided with adequate access for inspection and shall be in operation when the core final dryer (CS-2) is operating.  
(9 VAC 5-80-850, Condition 15 of 7/17/02 Permit)
14. **Emission Controls** – Particulate emissions from the production line reclaim (PF-1) shall be controlled by a Clarke Model 1-60-20 fabric filter baghouse (C13) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 41408 ACFM. The baghouse (C13) shall be provided with adequate access for inspection and shall be in operation when the production line reclaim (PF-1) is operating.  
(9 VAC 5-80-850, Condition 16 of 7/17/02 Permit)
15. **Emission Controls** – Particulate emissions from the pressline trim saws (PF-3A) and the Jenkins T&E saw (PF-3B) shall be controlled by a Clarke Model 1-40-20 fabric filter baghouse (C14) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 27306 ACFM. The baghouse (C14) shall be provided with adequate access for inspection and shall be in operation when the processes (PF-3A or PF-3B) are operating.  
(9 VAC 5-80-850, Condition 17 of 7/17/02 Permit)
16. **Emission Controls** – Particulate emissions from the Kimwood 6-head sander (PF-5) shall be controlled by two Clarke Model 1-60-20 fabric filter baghouses (C15 and C16). Each baghouse shall have a minimum particulate control efficiency of 99.9%, and each shall have a maximum exhaust grain loading of 0.003 gr/dscft. The baghouse identified as C15 shall have a maximum system air movement capacity of 37981 ACFM. The baghouse identified as C16 shall have a maximum system air movement capacity of 38972 ACFM. The baghouses (C15 and C16) shall be provided with adequate access for inspection and shall be in operation when the sander (PF-5) is operating.  
(9 VAC 5-80-850, Condition 18 of 7/17/02 Permit)
17. **Emission Controls** – Particulate emissions from the dryer sanderdust collection system and bin (PF-6) shall be controlled by a Clarke Model 1-15-20 fabric filter baghouse (C17) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 11160 ACFM. The baghouse (C17) shall be provided with adequate access for inspection and shall be in operation when the collection system (PF-6) is operating.  
(9 VAC 5-80-850, Condition 19 of 7/17/02 Permit)

18. **Emission Controls** – Particulate emissions from the IMC saw (PF-7A) and the board breaker (PF-7B) shall be controlled by a Clarke Model 1-40-20 fabric filter baghouse (C18) with a maximum exhaust grain loading of 0.003 gr/dscft and a maximum system air movement capacity of 24344 ACFM. The baghouse (C18) shall be provided with adequate access for inspection and shall be in operation when the IMC saw (PF-7A) or the board breaker (PF-7B) is operating.  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 20 of 7/17/02 Permit)
19. **Fuel** - The approved fuel for the Ames boiler (B-3) and the Cleaver Brooks boiler (B-2) is natural gas. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-850, Condition 24 of 7/17/02 Permit)
20. **Fuel Throughput** - The Ames boiler (B-3) and the Cleaver Brooks boiler (B-2) shall consume no more than  $10 \times 10^6$  cubic feet of natural gas per year combined, calculated monthly as the sum of each consecutive 12 month period.  
(9 VAC 5-80-850, Condition 25 of 7/17/02 Permit)
21. **Fuel** - The approved fuels for the Keeler boiler (B-1) are distillate oil and wood sander dust. A change in the fuels may require a permit to modify and operate.  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 26 of 7/17/02 Permit)
22. **Fuel Throughput** - The Keeler boiler (B-1) shall consume annually no more than the quantities of fuel that satisfy the following equation:  
$$X*(140,000 \text{ btu/gal}) + Y*(16,000,000 \text{ btu/ton}) \leq 153,600 \times 10^6 \text{ btu's/year}$$

Where:    X = annual consumption of distillate oil, in gallons  
              Y = annual consumption of wood sander dust, in tons

Annual consumption of each type of fuel shall be calculated monthly as sum of the previous consecutive 12 month period. Compliance with the above formula shall be determined and recorded monthly.  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 27 of 7/17/02 Permit)
23. **Operating Hours** - The core pre-dryer (CS-1) shall not operate more than 7900 hours per year, calculated monthly as the sum of each consecutive 12 month period.  
(9 VAC 5-80-850, Condition 28 of 7/17/02 Permit)
24. **Fuel** - The approved fuels for the core pre-dryer supplemental heater (CS-1) are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-850, Condition 29 of 7/17/02 Permit)
25. **Fuel Throughput** - The core pre-dryer supplemental heater (CS-1) shall consume annually no more than the quantities of fuel that satisfy the following equation:

$$X*(140,000 \text{ btu/gal}) + Y*(1000 \text{ btu/cft}) \leq 20,000 \times 10^6 \text{ btu's/year}$$

Where: X = annual consumption of distillate oil, in gallons  
Y = annual consumption of natural gas, in cubic feet

Annual consumption of each type of fuel shall be calculated monthly as sum of the previous consecutive 12 month period. Compliance with the above formula shall be determined and recorded monthly.

(9 VAC 5-80-850, Condition 30 of 7/17/02 Permit)

26. **Fuel** - The approved fuels for the core final dryer supplemental heater (CS-2) are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate.

(9 VAC 5-80-850, Condition 31 of 7/17/02 Permit)

27. **Fuel Throughput** - The core final dryer supplemental heater (CS-2) shall consume annually no more than the quantities of fuel that satisfy the following equation:

$$X*(140,000 \text{ btu/gal}) + Y*(1000 \text{ btu/cft}) \leq 20,000 \times 10^6 \text{ btu's/year}$$

Where: X = annual consumption of distillate oil, in gallons  
Y = annual consumption of natural gas, in cubic feet

Annual consumption of each type of fuel shall be calculated monthly as sum of the previous consecutive 12 month period. Compliance with the above formula shall be determined and recorded monthly.

(9 VAC 5-80-850, Condition 32 of 7/17/02 Permit)

28. **Throughput** - The output of wood furnish from the core final dryer (CS-2) shall not exceed 90,000 actual tons per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, Condition 33 of 7/17/02 Permit)

29. **Operating Hours** - The face pre-dryer (FS-1A) shall not operate more than 7900 hours per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, Condition 34 of 7/17/02 Permit)

30. **Fuel** - The approved fuels for the face pre-dryer supplemental heater (FS-1A) are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate.

(9 VAC 5-80-850, Condition 35 of 7/17/02 Permit)

31. **Fuel Throughput** - The face pre-dryer supplemental heater (FS-1A) shall consume annually no more than the quantities of fuel that satisfy the following equation:

$$X*(140,000 \text{ btu/gal}) + Y*(1000 \text{ btu/cft}) \leq 75,000 \times 10^6 \text{ btu's/year}$$

Where: X = annual consumption of distillate oil, in gallons  
Y = annual consumption of natural gas, in cubic feet

Annual consumption of each type of fuel shall be calculated monthly as sum of the previous consecutive 12 month period. Compliance with the above formula shall be determined and recorded monthly.

(9 VAC 5-80-850, Condition 36 of 7/17/02 Permit)

32. **Fuel** - The approved fuels for the face final dryer (FS-2) are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate.

(9 VAC 5-80-850, Condition 37 of 7/17/02 Permit)

33. **Fuel Throughput** – The face final dryer (FS-2) shall consume annually no more than the quantities of fuel that satisfy the following equation:

$$X*(140,000 \text{ btu/gal}) + Y*(1000 \text{ btu/cft}) \leq 65,000 \times 10^6 \text{ btu's/year}$$

Where: X = annual consumption of distillate oil, in gallons  
Y = annual consumption of natural gas, in cubic feet

Annual consumption of each type of fuel shall be calculated monthly as sum of the previous consecutive 12 month period. Compliance with the above formula shall be determined and recorded monthly.

(9 VAC 5-80-850, Condition 38 of 7/17/02 Permit)

34. **Throughput** - The output of wood furnish from the face final dryer (FS-2) shall not exceed 74,000 actual tons per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, Condition 39 of 7/17/02 Permit)

35. **Fuel** - The approved fuel for the McConnell burner (FS-1B) and the Energex burner (CS-3) is wood sander dust. The McConnell burner (FS-1B) and the Energex burner (CS-3) may also use natural gas as a startup fuel. A change in the fuels may require a permit to modify and operate.

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 40 of 7/17/02 Permit)

36. **Fuel Throughput** - The McConnell burner (FS-1B) shall consume no more than 4,428 tons of wood sander dust per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 41 of 7/17/02 Permit)

37. **Fuel Throughput** - The Energex burner (CS-3) shall consume no more than 10,000 tons of wood sander dust per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, Condition 42 of 7/17/02 Permit)

38. **Production** - The production of particleboard from the press (PF-2) shall not exceed 111,300,000 square feet per year, on a  $\frac{3}{4}$  inch basis, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, Condition 43 of 7/17/02 Permit)

39. **Fuel** - The distillate oil and natural gas shall meet the specifications below:

DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

Maximum sulfur content per shipment: 0.2%

NATURAL GAS:

Minimum heat content: 900 Btu/cf HHV.

(9 VAC 5-80-850, Condition 44 of 7/17/02 Permit)

40. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

- a. The name of the fuel supplier;
- b. The date on which the distillate oil was received;
- c. The volume of distillate oil delivered in the shipment;
- d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications for numbers 1 or 2 fuel oil,
- e. The sulfur content of the distillate oil.

(9 VAC 5-80-850, Condition 45 of 7/17/02 Permit)

41. **Emission Limits** – Hourly emissions from the operation of the Ames boiler (B-3) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-B-1.

Nitrogen Oxides (as NO<sub>2</sub>) 0.5 lbs/hr

(9 VAC 5-80-850, Condition 46 of 7/17/02 Permit)

42. **Emission Limits** – Hourly emissions from the operation of the Cleaver Brooks (B-2) boiler shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-B-2.

Nitrogen Oxides (as NO <sub>2</sub> )	1.0 lbs/hr
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Carbon Monoxide (9 VAC 5-80-850, Condition 47 of 7/17/02 Permit)	0.9 lbs/hr
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43. **Emission Limits** – Combined annual emissions from the Ames boiler (B-3) and the Cleaver Brooks boiler (B-2) shall not exceed the limitations specified below:

Nitrogen Oxides (as NO <sub>2</sub> )	0.5 tons/yr
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Carbon Monoxide (9 VAC 5-80-850, Condition 48 of 7/17/02 Permit)	0.4 tons/yr
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44. **Emission Limits** – Emissions from the operation of the Keeler boiler (B-1) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-B-1.

Particulate Matter	0.47 lbs/mmbtu	8.0 lbs/hr	23.2 tons/yr
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PM-10	0.47 lbs/mmbtu	8.0 lbs/hr	23.2 tons/yr
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Sulfur Dioxide	4.7 lbs/hr	15.6 tons/yr
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Nitrogen Oxides (as NO <sub>2</sub> )	15.5 lbs/hr	44.7 tons/yr
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Carbon Monoxide	38.7 lbs/hr	111.9 tons/yr
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Volatile Organic Compounds	1.0 lbs/hr	2.9 tons/yr
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(9 VAC 5-40-900, 9 VAC 5-80-850, Condition 49 of 7/17/02 Permit))

45. **Emission Limits** – Combined emissions from the operation of the core pre dryer (CS-1), the core final dryer (CS-2), and the Energex burner (CS-3) shall not exceed the limits specified below. These emissions shall be measured at the stacks identified as EP-CS-1, EP-CS-2, and EP-CS-3.

Particulate Matter	24.2 lbs/hr	71.9 tons/yr
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PM-10	22.8 lbs/hr	68.6 tons/yr
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Sulfur Dioxide	10.8 lbs/hr	6.1 tons/yr
Nitrogen Oxides (as NO <sub>2</sub> )	41.8 lbs/hr	103.4 tons/yr
Carbon Monoxide	14.1 lbs/hr	30.5 tons/yr
Volatile Organic Compounds (9 VAC 5-80-850, Condition 50 of 7/17/02 Permit)	13.6 lbs/hr	36.9 tons/yr

46. **Emission Limits** – Combined emissions from the operation of the McConnell burner (FS-1B) and the face pre-dryer (FS-1A) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-FS-1.

Particulate Matter	6.8 lbs/hr	27.0 tons/yr
PM-10	6.8 lbs/hr	27.0 tons/yr
Sulfur Dioxide	5.8 lbs/hr	8.5 tons/yr
Nitrogen Oxides (as NO <sub>2</sub> )	61.0 lbs/hr	78.0 tons/yr
Carbon Monoxide	12.2 lbs/hr	15.9 tons/yr
Volatile Organic Compounds (9 VAC 5-80-850, 9 VAC 5-50-260, Condition 51 of 7/17/02 Permit)	17.5 lbs/hr	69.1 tons/yr

47. **Emission Limits** – Emissions from the operation of the face final dryer (FS-2) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-FS-2.

Particulate Matter	10.0 lbs/hr	42.5 tons/yr
PM-10	9.8 lbs/hr	42.3 tons/yr
Sulfur Dioxide	5.1 lbs/hr	6.6 tons/yr
Nitrogen Oxides (as NO <sub>2</sub> )	3.6 lbs/hr	4.6 tons/yr
Carbon Monoxide	2.1 lbs/hr	2.7 tons/yr

Volatile Organic Compounds	9.2 lbs/hr	18.3 tons/yr
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(9 VAC 5-80-850, Condition 52 of 7/17/02 Permit)

48. **Emission Limits** – Combined emissions from the operation of the press (PF-2) shall not exceed the limits specified below. These emissions shall be measured at the stacks identified as EP-PF-2A and EP-PF-2B.

Particulate Matter	0.7 lbs/hr	1.7 tons/yr
PM-10	0.7 lbs/hr	1.7 tons/yr
Volatile Organic Compounds	42.0 lbs/hr	97.4 tons/yr

(9 VAC 5-80-850, Condition 53 of 7/17/02 Permit)

49. **Emission Limits** – Emissions from the operation of the board cooler (PF-4) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-PF-4.

Particulate Matter	0.3 lbs/hr	0.8 tons/yr
PM-10	0.3 lbs/hr	0.8 tons/yr
Volatile Organic Compounds	9.1 lbs/hr	21.0 tons/yr

(9 VAC 5-80-850, Condition 54 of 7/17/02 Permit)

50. **Emission Limits** – Combined emissions from the operation of the sander (PF-5) shall not exceed the limits specified below. These emissions shall be measured at the stacks identified as EP-PF-5A and EP-PF-5B.

Particulate Matter	0.003 gr/dscft	2.0 lbs/hr	8.7 tons/yr
PM-10	0.003 gr/dscft	2.0 lbs/hr	8.7 tons/yr

(9 VAC 5-80-850, Condition 55 of 7/17/02 Permit)

51. **Emission Limits** – Emissions from the operation of the trim recovery bin (FS-4) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-FS-4.

Particulate Matter                      0.4 lbs/hr    1.8 tons/yr

PM-10                                      0.4 lbs/hr    1.8 tons/yr  
(9 VAC 5-80-850, Condition 56 of 7/17/02 Permit)

52. **Emission Limits** – Combined emissions from the operation of the hog (FS-3A), the accepts aspirator (FS-3B), and the fines aspirator (FS-3C) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-FS-3.

Particulate Matter      0.01 gr/dscft              1.2 lbs/hr    5.3 tons/yr

PM-10                              0.01 gr/dscft              1.2 lbs/hr    5.3 tons/yr  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 57 of 7/17/02 Permit)

53. **Emission Limits** – Combined emissions from the operation of Bauer refiners 1 through 4 (CS-6A, CS-6B, CS-6C, and CS-6D) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-CS-6.

Particulate Matter      0.003 gr/dscft              0.6 lbs/hr    2.7 tons/yr

PM-10                              0.003 gr/dscft              0.6 lbs/hr    2.7 tons/yr  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 58 of 7/17/02 Permit)

54. **Emission Limits** – Combined emissions from the operation of Bauer refiners 5 and 6 (CS-7A and CS-7B) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-CS-7.

Particulate Matter      0.003 gr/dscft              0.6 lbs/hr    2.7 tons/yr

PM-10                              0.003 gr/dscft              0.6 lbs/hr    2.7 tons/yr  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 59 of 7/17/02 Permit)

55. **Emission Limits** – Combined emissions from the operation of shaker screens 1, 2, and 3 (CS-4A, CS-4B, and CS-4C) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-CS-4.

Particulate Matter      0.003 gr/dscft              1.1 lbs/hr    5.0 tons/yr

PM-10                              0.003 gr/dscft              1.1 lbs/hr    5.0 tons/yr  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 60 of 7/17/02 Permit)

56. **Emission Limits** – Combined emissions from the operation of shaker screens 4 and 5 (CS-5A and CS-5B) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-CS-5.

Particulate Matter	0.003 gr/dscft	1.0 lbs/hr	4.4 tons/yr
PM-10	0.003 gr/dscft	1.0 lbs/hr	4.4 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 61 of 7/17/02 Permit)

57. **Emission Limits** – Combined emissions from the operation of the pressline trim saws (PF-3A) and the Jenkins T&E saw (PF-3B) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-PF-3.

Particulate Matter	0.003 gr/dscft	0.7 lbs/hr	3.1 tons/yr
PM-10	0.003 gr/dscft	0.7 lbs/hr	3.1 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 62 of 7/17/02 Permit)

58. **Emission Limits** – Emissions from the operation of the dryer sanderdust fuel collection system (PF-6) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-PF-6.

Particulate Matter	0.003 gr/dscft	0.3 lbs/hr	1.3 tons/yr
PM-10	0.003 gr/dscft	0.3 lbs/hr	1.3 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 63 of 7/17/02 Permit)

59. **Emission Limits** – Combined emissions from the operation of Pallman refiners 1, 2, and 3 (FS-5A, FS-5B, FS-5C) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-FS-5.

Particulate Matter	0.003 gr/dscft	1.1 lbs/hr	4.7 tons/yr
PM-10	0.003 gr/dscft	1.1 lbs/hr	4.7 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 64 of 7/17/02 Permit)

60. **Emission Limits** – Emissions from the operation of the production line air handling system (PF-1) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-PF-1.

Particulate Matter	0.003 gr/dscft	1.1 lbs/hr	4.7 tons/yr
PM-10	0.003 gr/dscft	1.1 lbs/hr	4.7 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 65 of 7/17/02 Permit)

61. **Emission Limits** – Combined emissions from the operation of the IMC saw (PF-7A) and the board breaker (PF-7B) shall not exceed the limits specified below. These emissions shall be measured at the stack identified as EP-PF-7.

Particulate Matter      0.003 gr/dscft      0.6 lbs/hr    2.7 tons/yr

PM-10                      0.003 gr/dscft      0.6 lbs/hr    2.7 tons/yr  
(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 66 of 7/17/02 Permit)

62. **Plantwide Emission Limits** - Total point source emissions from entire facility shall not exceed the limits specified below:

Particulate Matter                      214.9 tons/yr

PM-10                                      211.4 tons/yr

Sulfur Dioxide                          36.7 tons/yr

Nitrogen Oxides                      231.7 tons/yr  
(as NO<sub>2</sub>)

Carbon Monoxide                      162.0 tons/yr

Volatile Organic Compounds      245.7 tons/yr  
(9 VAC 5-80-850, Condition 67 of 7/17/02 Permit)

63. **Visible Emission Limit** - Visible emissions from the control devices listed below controlling emissions from the equipment listed below shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

EU-ID	EU Description	PCP ID	Exhaust ID
FS-3A FS-3B FS-3C	Hog Accepts Aspirator Fines Aspirator	C04	EP-FS-3
FS-5A FS-5B FS-5C	Pallman face refiners 1, 2, and 3	C06	EP-FS-5
CS-4A CS-4B CS-4C	Shaker screens 1, 2, and 3	C09	EP-CS-4
CS-5A CS-5B	Shaker screens 4 and 5	C10	EP-CS-5
CS-6A CS-6B CS-6C CS-6D	Bauer refiners 1 through 4	C11	EP-CS-6
CS-7A CS-7B	Bauer refiners 5 and 6	C12	EP-CS-7
PF-1	Production line air handling	C13	EP-PF-1

EU-ID	EU Description	PCP ID	Exhaust ID
PF-3A PF-3B	Pressline trim saws Jenkins T&E saw	C14	EP-PF-3
PF-5	Kimwood 6-head sander	C15 C16	EP-PF-5A EP-PF-5B
PF-6	Dryer sanderdust collection system and bin	C17	EP-PF-6
PF-7A PF-7B	IMC saw Board breaker	C18	EP-PF-7

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 68 of 7/17/02 Permit)

64. **Visible Emission Limit** - Visible emissions from any fugitive emission point associated with the accepts aspirator (FS-3B) and the fines aspirator (FS-3C) shall not exceed 10 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 69 of 7/17/02 Permit)

65. **Visible Emission Limit** - Visible emissions from the exhaust point (EP-FS-1) of the McConnell burner (FS-1B) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-80-850, 9 VAC 5-50-20, 9 VAC 5-50-260, Condition 70 of 7/17/02 Permit)

66. **Visible Emission Limit** - Visible emissions from the exhaust point (EP-FS-4) of the Trim Recovery Bin (FS-4) shall not exceed 10 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110)

67. **Visible Emission Limit** – Visible emissions from the exhaust point (EP-B-1) of the Keeler Boiler (B-1) shall not exceed 20 percent opacity, except for one six-minute period in any one hour of not more than 60 percent opacity. Failure to meet this requirement because of the presence of water vapor shall not be a violation of requirement.

(9 VAC 5-40-940)

68. **Permit Copy** - The permittee shall keep a copy of the state operating permit on the premises of the facility to which it applies.

(9 VAC 5-80-860 D, Condition #89 of 7/17/02 Permit)

## B. Monitoring and Record Keeping

1. **Monitoring Devices** - The following control equipment shall be equipped with devices to continuously measure the differential pressure drop across each fabric filter: C04, C06, C09, C10, C11, C12, C13, C14, C15, C16, C17, and C18. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the

manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the corresponding fabric filter is operating.

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 21 of 7/17/02 Permit)

2. **Monitoring Device Observation** – The devices used to continuously measure the differential pressure drop across each baghouse, as required by Condition III.B.1 shall be observed by the permittee with a frequency of not less than once per calendar week. The permittee shall keep a log of the weekly observations from each of the differential pressure drop devices.

(9 VAC 5-50-50 H, 9 VAC 5-80-850, 9 VAC 5-50-260, Condition 22 of 7/17/02 Permit)

3. **Inspections of Control Devices** – The permittee shall perform an annual internal inspection on each of the following cyclones to insure structural integrity: C01, C02, C03, C05, C07, and C08. Dates, inspection results, and follow up maintenance and repair shall be recorded for each cyclone inspection.

(9 VAC 5-80-850, 9 VAC 5-50-260, Condition 23 of 7/17/02 Permit)

4. **Visible Emissions Evaluations** – The permittee shall examine the exhausts listed below monthly for the presence of visible emissions while the emission units are operating. If visible emissions are observed, the permittee shall perform a visible emissions evaluation in accordance with 40 CFR 60 Appendix A Method 9 to determine the opacity of the exhaust. The permittee shall maintain a log containing the date and time of each monthly check for the presence of visible emissions and the results of any Method 9 observations performed.

EU-ID	EU Description	PCP ID	Exhaust ID
FS-3A FS-3B FS-3C	Hog Accepts Aspirator Fines Aspirator	C04	EP-FS-3
FS-4	Trim Recovery Bin	C05	EP-FS-4
FS-5A FS-5B FS-5C	Pallman face refiners 1, 2, and 3	C06	EP-FS-5
CS-4A CS-4B CS-4C	Shaker screens 1, 2, and 3	C09	EP-CS-4
CS-5A CS-5B	Shaker screens 4 and 5	C10	EP-CS-5
CS-6A CS-6B CS-6C CS-6D	Bauer refiners 1 through 4	C11	EP-CS-6
CS-7A CS-7B	Bauer refiners 5 and 6	C12	EP-CS-7
PF-1	Production line air handling	C13	EP-PF-1
PF-3A PF-3B	Pressline trim saws Jenkins T&E saw	C14	EP-PF-3
PF-5	Kimwood 6-head sander	C15 C16	EP-PF-5A EP-PF-5B
PF-6	Dryer sanderdust collection system and bin	C17	EP-PF-6

EU-ID	EU Description	PCP ID	Exhaust ID
PF-7A PF-7B	IMC saw Board breaker	C18	EP-PF-7

(9 VAC 5-80-110)

5. **Visible Emissions Evaluations** – The permittee shall examine the exhaust labeled EP-FS-1 monthly for the presence of visible emissions while the McConnell burner (FS-1B) is operating. If visible emissions are observed, the permittee shall perform a visible emissions evaluation in accordance with 40 CFR 60 Appendix A Method 9 to determine the opacity of the exhaust. The permittee shall maintain a log containing the date and time of each monthly check for the presence of visible emissions and the results of any Method 9 observations performed.

(9 VAC 5-80-110)

6. **Visible Emissions Evaluations** – The permittee shall examine the exhaust labeled EP-B-1 monthly for the presence of visible emissions while the Keeler boiler (B-1) is operating. If visible emissions are observed, the permittee shall perform a visible emissions evaluation in accordance with 40 CFR 60 Appendix A Method 9 to determine the opacity of the exhaust. The permittee shall maintain a log containing the date and time of each monthly check for the presence of visible emissions and the results of any Method 9 observations performed.

(9 VAC 5-80-110)

7. **Visible Emissions Evaluations** – The permittee shall examine the area surrounding the accepts aspirator (FS-3B) and the fines aspirator (FS-3C) monthly for the presence of fugitive visible emissions while this equipment is operating. If visible emissions are observed, the permittee shall perform a visible emissions evaluation in accordance with 40 CFR 60 Appendix A Method 9 to determine the opacity of the exhaust. The permittee shall maintain a log contain the date and time of each monthly check for the presence of visible emissions and the results of any Method 9 observations performed.

(9 VAC 5-80-110)

8. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

- a. Results of all stack tests, visible emission evaluations and performance evaluations.
- b. Combined annual throughput of natural gas to the Ames boiler (B-3) and the Cleaver Brooks boiler (B-2), calculated monthly as the sum of each consecutive 12 month period



- c. Annual throughput of distillate oil to the Keeler boiler (B-1), calculated monthly as the sum of each consecutive 12 month period
- d. Annual throughput of wood sander dust to the Keeler boiler (B-1), calculated monthly as the sum of each consecutive 12 month period.
- e. Monthly compliance demonstrations with fuel usage formula for the Keeler boiler (B-1) as listed in Condition III.A.22.
- f. Annual hours of operation of the core pre-dryer (CS-1), calculated monthly as the sum of each consecutive 12 month period.
- g. Annual throughput of distillate oil to the core pre-dryer (CS-1), calculated monthly as the sum of each consecutive 12 month period.
- h. Annual throughput of natural gas to the core pre-dryer (CS-1), calculated monthly as the sum of each consecutive 12 month period.
- i. Monthly compliance demonstrations with fuel usage formula for the core pre-dryer (CS-1) as listed in Condition III.A.25.
- j. Annual throughput of distillate oil to the core final dryer (CS-2), calculated monthly as the sum of each consecutive 12 month period.
- k. Annual throughput of natural gas to the core final dryer (CS-2), calculated monthly as the sum of each consecutive 12 month period.
- l. Annual output of wood furnish from the core final dryer (CS-2), calculated monthly as the sum of each consecutive 12 month period.
- m. Monthly compliance demonstrations with fuel usage formula for the core final dryer (CS-2) as listed in Condition III.A.27.
- n. Annual hours of operation of the face pre-dryer (FS-1A), calculated monthly as the sum of each consecutive 12 month period.
- o. Annual throughput of distillate oil to the face pre-dryer (FS-1A), calculated monthly as the sum of each consecutive 12 month period.
- p. Annual throughput of natural gas to the face pre-dryer (FS-1A), calculated monthly as the sum of each consecutive 12 month period.

- q. Monthly compliance demonstrations with fuel usage formula for the face pre-dryer (FS-1A) as listed in Condition III.A.31.
- r. Annual throughput of distillate oil to the face final dryer (FS-2), calculated monthly as the sum of each consecutive 12 month period.
- s. Annual throughput of natural gas to the face final dryer (FS-2), calculated monthly as the sum of each consecutive 12 month period.
- t. Annual output of wood furnish from the face final dryer (FS-2), calculated monthly as the sum of each consecutive 12 month period.
- u. Monthly compliance demonstrations with fuel usage formula for the face final dryer (FS-2) as listed in III.A.33.
- v. Annual throughput of wood sander dust to the McConnell burner (FS-1B), calculated monthly as the sum of each consecutive 12 month period.
- w. Annual throughput of wood sander dust to the Energex burner (CS-3), calculated monthly as the sum of each consecutive 12 month period.
- x. Annual production of particleboard from the press (PF-2), calculated monthly as the sum of each consecutive 12 month period.
- y. All fuel supplier certifications.
- z. Monthly emissions calculations for emissions of criteria pollutants from the particleboard manufacturing facility to verify compliance with the ton/yr emissions limitations in III.A.62. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- aa. Differential pressure drop logs for all control equipment as required by III.B.2.
- bb. Records of inspections performed for all control equipment as required by Condition III.B.3.
- cc. Scheduled and unscheduled maintenance, and operator training.
- dd. Times and dates when any control device required by this permit was not in use or was inoperative while the emission unit being controlled was operating.

- ee. Dates, times, and results of all monthly visible emissions checks required by this permit, and the results of any Method 9 observations performed.
- ff. Emission factors, emission formulas, rated capacities and maximum air flow capacities for the following equipment to support emission rate calculations for each piece of equipment:

EUID or PCDID	Pollutant	Required Record Keeping
B1, Ames Boiler	NOx, CO	Emission factors, boiler rated capacity, formulas annual emission calculations, fuel(s) used.
B2, Cleaver Brooks Boiler	NOx, CO	Emission factors, boiler rated capacity, formulas annual emission calculations, fuel(s) used.
PF2, press	PT	Emission factor, maximum capacities, formula, annual emission calculations
PF4, board cooler	PT	Emission factor, maximum capacities, formula, annual emission calculations
B1,, Keeler boiler	SO2, VOC	Emission factors, maximum capacities, formula, annual emission calculations
Baghouses: C04, C06, C09, C10, C11, C12, C13, C14, C15, C16, C17, and C18	PT	Grain loading requirement, maximum air flow capacity, formula, annual emission calculations

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-900, 9 VAC 5-80-110, 9 VAC 5-50-50, Condition 80 of 7/17/02 Permit)

### C. Testing

1. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.  
(9 VAC 5-80-930, 9 VAC 5-50-30 F, Condition 71 of 7/17/02 Permit)
2. **Periodic Monitoring Stack Test for the Keeler Boiler** – Once during the five year term of this permit, and once every five years thereafter, the permittee shall conduct performance tests for particulate, PM10, CO, and NOx to determine compliance with the emission limitations listed in Condition III.A.44 from the Keeler boiler, B-3. These tests shall take place within 18 months of initial issuance of this Title V permit, and the boiler shall be operating at a minimum of 80% of maximum rated capacity. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. The details of the tests are to be arranged with the Director, Piedmont Region. The

permittee shall submit a test protocol at least 60 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 60 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-80-110)

3. **Periodic Monitoring Stack Test for the Core System** – Once during the five year term of this permit, and once every five years thereafter, performance tests shall be conducted for VOC, NO<sub>x</sub>, CO, and particulate matter from the combined emissions of the core system exiting stacks EP-CS-1, EP-CS-2, EP-CS-3 to determine compliance with the emission limits contained in III.A.45. The permittee may submit testing information as required in Condition III.C.2 in lieu of the testing required for this permit term. If this information is not submitted, the first test shall take place within 18 months of initial issuance of this Title V permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. The details of the tests are to be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least 60 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 60 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-80-110)

4. **Periodic Monitoring Stack Test for the Face Pre-Dryer** – Once during the five year term of this permit, and once every five years thereafter, performance tests shall be conducted for VOC, NO<sub>x</sub>, CO, and particulate from the McConnell burner (FS-1B) and the face pre-dryer (FS-1A) at the exhaust identified as EP-FS-1 to determine compliance with the emission limits contained in Condition III.A.46. The permittee may submit testing information as required in Condition III.C.3 in lieu of the testing required for this permit term. If this information is not submitted, the first test shall take place within 18 months of initial issuance of this Title V permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. The details of the tests are to be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least 60 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 60 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-80-110)

5. **Periodic Monitoring Stack Test for the Face Final Dryer** – Once during the five year term of this permit, and once every five years thereafter, performance tests shall be conducted for VOC, NO<sub>x</sub>, CO, and particulate from the face final dryer (FS-2) at the exhaust identified as EP-FS-2 to determine compliance with the emission limits contained in Condition III.A.47. The permittee may submit testing information as required in Condition III.C.4 in lieu of the testing required for this permit term. If this information is not submitted, the first test shall take place within 18 months of initial issuance of this Title V permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. The details of the tests are to be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least 60 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 60 days after test completion and shall conform to the test report format enclosed with this permit.  
(9 VAC 5-80-110)
6. **Periodic Monitoring Stack Test for the Press** – Once during the five year term of this permit, and once every five years thereafter, performance tests shall be conducted for VOC from the press (PF-2) from exhausts identified as EP-PF-2A and EP-PF-2B to determine compliance with the emission limits contained in Condition III.A.48. The permittee may submit testing information as required in Condition III.C.5 in lieu of the testing required for this permit term. If this information is not submitted, the first test shall take place within 18 months of initial issuance of this Title V permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and 9 VAC 5-60-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-70. The details of the tests are to be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least 60 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 60 days after test completion and shall conform to the test report format enclosed with this permit.  
(9 VAC 5-80-110)
7. **Test Methods** - If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a, other method as approved by DEQ
VOC Content	EPA Methods 24, 24a
NO <sub>x</sub>	EPA Method 7

SO <sub>2</sub>	EPA Method 6
CO	EPA Method 10
PM/PM-10	EPA Method 5, 17, other method as approved by DEQ
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

#### **D. Reporting**

1. **Annual Reporting Requirements** – The permittee shall submit the following reports annually, as part of the compliance certification for this facility:

- a. Times, dates, and results of annual cyclone integrity inspections.
- b. Times, dates, and explanations of inoperative or bypassed required control devices.
- c. Changes in any equipment specifications that may alter the results of any emission limitation demonstration.

(9 VAC 5-80-110)

2. **Semi-Annual Reporting Requirements** – The permittee shall submit the following reports semi-annually, as part of the compliance certification for this facility:

- a. The amount of wood furnish sent through each final dryer system
- b. The hours of operation of each pre dryer system;
- c. The amount of fuel used in each fuel burning unit as well as the results of each unit's compliance equation;
- d. The amount of board produced;
- e. The average sulfur content of fuel oil used in terms of percent by weight;
- f. Total annual point source emissions for the facility for the previous 12 months.
- g. Results of any stack tests or visible emission observations performed in accordance with 40 CFR 60 Appendix A, Method 9.

(9 VAC 5-80-110)

#### IV. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
	Wax emulsion storage tank	9 VAC 5-80-720 B	VOC	12,000 gallons
	3 resin storage tanks	9 VAC 5-80-720 B	VOC	10,000 gallons
	Urea/water solution storage tank	9 VAC 5-80-720 B	VOC	12,000 gallons
	Diesel fuel storage tank	9 VAC 5-80-720 B	VOC	40,000 gallons
	Diesel fuel feed tank	9 VAC 5-80-720 B	VOC	1,000 gallons
	Equipment gasoline fuel tank	9 VAC 5-80-720 B	VOC	250 gallons
	Fire pump diesel tank	9 VAC 5-80-720 B	VOC	250 gallons

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, record keeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

## V. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels	Diesel fuel storage tank listed in insignificant activities is not subject to the record keeping and reporting section of this regulation since the date of construction of the tank is prior to the applicability date of the regulation.
40 CFR 60 Subpart Dc	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	The boilers are not subject to this standard since the date of construction of each boiler is prior to the applicability date of the regulation.
9 VAC 5-40 Part II Article 8	Emission Standards for Fuel Burning Equipment	This regulation does not apply to the Ames Boiler (B-3) since it burns natural gas and has a maximum rated capacity of less than 10 million btu/hr. This regulation also does not apply to the Cleaver Brooks boiler (B-2) since the date of construction is after the applicability date in the regulation.
9 VAC 5-40-Part II Article 4	Emission Standards for General Process Operations	This regulation does not apply to the McConnell Burner (FS-1B) since this unit was installed after the applicability date of this regulation for combustion installations.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.  
(9 VAC 5-80-140)



## **VI. General Conditions**

### **A. Federal Enforceability**

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

### **B. Permit Expiration**

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete renewal application to the Department consistent with 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal, but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied, and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant to section 9 VAC 5-80-80 D, the applicant fails to submit, by the deadline specified in writing by the Board, any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

### C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. Reports shall cover a period of six months. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report.
- b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
  - (1) Exceedance of emissions limitations or operational restrictions;
  - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
  - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

**D. Annual Compliance Certification**

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for a period of twelve months. The report shall be postmarked or delivered no later than 60 days following the end of the twelve-month period. The reporting periods shall coincide with the monitoring reporting periods. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1<sup>st</sup> to December 31<sup>st</sup>.
2. A description of the means for assessing or monitoring the compliance of the source with its emission limitations, standards, and work practices.
3. The identification of each term or condition of the permit that is the basis of the certification.
4. Whether compliance was continuous or intermittent, (and if not continuous, documentation of each incident of non-compliance.)
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. The status of compliance with the terms and conditions of this permit for this reporting period.
7. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)  
U. S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

**E. Permit Deviation Reporting**

The permittee shall notify the Director, Piedmont Regional Office, within 4 daytime business hours after discovery of any deviations from permit requirements which may

cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VI.C.3 of this permit. (9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

#### **F. Failure/Malfunction Reporting**

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours, notify the Director, Piedmont Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within two weeks provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office. (9 VAC 5-20-180 C)

#### **G. Severability**

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit. (9 VAC 5-80-110 G.1)

#### **H. Duty to Comply**

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application. (9 VAC 5-80-110 G.2)

#### **I. Need to Halt or Reduce Activity not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110 G.3)

**J. Permit Action for Cause**

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

**K. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

**L. Duty to Submit Information**

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)
2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

**M. Duty to Pay Permit Fees**

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

**N. Fugitive Dust Emission Standards**

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

**O. Startup, Shutdown, and Malfunction**

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20)

**P. Alternative Operating Scenarios**

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

**Q. Inspection and Entry Requirements**

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

#### **R. Reopening For Cause**

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

#### **S. Permit Availability**

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

#### **T. Transfer of Permits**

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)

#### **U. Malfunction as an Affirmative Defense**

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
  - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.



3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.  
( 9 VAC 5-80-250)

#### **V. Permit Revocation or Termination for Cause**

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-260)

#### **W. Duty to Supplement or Correct Application**

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9 VAC 5-80-80 E)

#### **X. Stratospheric Ozone Protection**

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(40 CFR Part 82, Subparts A-F)

#### **Y. Accidental Release Prevention**

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(40 CFR Part 68)

#### **Z. Changes to Permits for Emissions Trading**

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

**AA. Emissions Trading**

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

**To:** Mr. Charles L. Turner, Compliance Manager  
Department of Environmental Quality – Piedmont Regional Office  
4949 A Cox Road  
Glen Allen, VA 23060

**From:** Nevamar Company, LLC.

**Registration No.** 50169

**Re:** TITLE V ANNUAL COMPLIANCE CERTIFICATION

**Date:**

Please find attached our Title V Annual Compliance Certification for the period from \_\_\_\_/\_\_\_\_/\_\_\_\_ to \_\_\_\_/\_\_\_\_/\_\_\_\_. It identifies each term or condition of the permit that is the basis of the certification. All deviations and periods of non-compliance for the period have been addressed in semi -annual monitoring reports that have either been previously submitted or are enclosed.

**Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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*(Signature )*

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*(Name & Title)*

cc: Director, Air and Waste Division (Mail drop 3AP00)  
United States Environmental Protection Agency -- Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

*(Annual Compliance Certifications are due 60 days following end of reporting period.)*

**To:** Mr. Charles L. Turner, Air Compliance Manager  
Department of Environmental Quality – Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, VA 23462

**From:** Nevamar Company, LLC

**Reg. No. 50169**

**Re:** PROMPT DEVIATION REPORT – Pursuant to Title V Permit

**Date:**

This confirms the deviation reported to the Regional Office at \_\_\_\_\_ o'clock on \_\_\_\_/\_\_\_\_/\_\_\_\_. The details are described below. The deviation may have caused excess emissions for more than one hour, consistent with specified averaging times. None of these deviations were related to a malfunction.

<b>Start date &amp; time:</b>	<b>End date &amp; time:</b>	<b>Estimated Duration:</b>
<b>Deviation from which permit condition (<i>condition number and brief description</i>):</b>		
<b>Description of incident (<i>including emission unit affected</i>):</b>		
<b>Description of Monitoring Requirement for affected unit(s):</b>		
<b>Probable cause:</b>		
<b>Description of corrective measures taken (<i>demonstrating a timely &amp; appropriate response</i>):</b>		
<b>Description of preventive measures taken:</b>		

**Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
(Signature )

\_\_\_\_\_  
(Name & Title)

To: Mr. Charles L. Turner, Air Compliance Manager  
Department of Environmental Quality – Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, VA 23060

From: Nevamar Company, LLC

Reg. No. 50169

Re: SEMI-ANNUAL MONITORING REPORT – Pursuant to Title V Permit

Date:

*The following monitoring report is submitted as required by our Title V permit. For the purposes of this report, deviation means (1) exceedances of emission limits, as determined by such means as stack testing, continuous emission monitors, parametric monitoring and EPA Method 9 visible emission evaluations; (2) excursions from control device operating parameter requirements such as afterburner temperature, scrubber flow rate, baghouse pressure drop; (3) excursions from operational restrictions things such as throughput, fuel quality, and coating VOC and HAP content; and (4) failure to meet monitoring, record keeping or reporting requirements. The report addresses all data points, which are above a standard, limit etc, according to the averaging period, if any, specified in the permit. If no averaging period is specified in the permit, then any monitored reading is considered a deviation to be reported. Deviations are reported regardless of whether they may have caused excess emissions or whether they were the result of a malfunction.*

The period covered by the report is from \_\_\_\_/\_\_\_\_/\_\_\_\_ to \_\_\_\_/\_\_\_\_/\_\_\_\_.

During the reporting period:

- ☐ No deviations from permit requirements occurred during this semi-annual reporting period. (We conducted all required monitoring and associated record keeping and reporting. Required monitoring revealed no deviations from permit requirements. )
- ☐ We failed to conduct required monitoring/record keeping/reporting as explained on the attached form.
- ☐ We identified deviations as a result of required monitoring:
- ☐ Deviations were addressed in CEM Excess Emission Report(s) dated: \_\_\_\_\_
- ☐ Deviations were addressed in Fuel Report(s) dated: \_\_\_\_\_
- ☐ Deviations were addressed in MACT Report(s) dated: \_\_\_\_\_
- ☐ Deviations due to malfunctions were addressed in letters dated: \_\_\_\_\_
- ☐ Deviations were addressed in other report(s) dated: \_\_\_\_\_
- Type of report: \_\_\_\_\_
- ☐ Deviations were previously described in Prompt Deviation Reports dated:
- \_\_\_\_\_
- \_\_\_\_\_
- ☐ “Other” deviations, which were not previously reported, are described in the attachment.

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
(Signature )

\_\_\_\_\_  
(Name & Title)

## FAILURE TO MONITOR, KEEP RECORDS OR REPORT

### Submitted as Part of Semi-Annual Monitoring Report

**Registration No. 50169**

Page \_\_\_\_\_ of \_\_\_\_\_

[illegible]

**Annual Compliance Certification**Registration No. 50169

Page \_\_\_\_\_ of \_\_\_\_\_

Cond. No.	TERMS & CONDITIONS CONTAINED IN THE PERMIT <i>(list in order)</i>	MEANS OF DETERMINING COMPLIANCE STATUS	TYPE OF DATA THE MEANS PROVIDES	PERIODS OF NON- COMPLIANCE
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input type="checkbox"/> No

**“OTHER” DEVIATIONS**

Submitted as Part of Semi-Annual Monitoring Report

Registration No. 50169

Page \_\_\_\_\_ of \_\_\_\_\_

Condition No. & Description of Requirement	Description of Deviation (time, emission unit, description of event, cause)	Description of Associated Monitoring Requirement	Description of corrective measures taken ( <i>demonstrating a timely &amp; appropriate response</i> )

*(Report deviations which may have caused excess emissions for more than one hour on a deviation report form, not here.)*